

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA
WINSTON-SALEM DIVISION**

LARRY D. REID and LARRY REID LIVE,
LLC,

Plaintiff,

v.

LAVONTRAYE ANDREWS,

Defendant.

COMPLAINT

No.:

Plaintiffs, Larry D. Reid and Larry Reid Live, LLC, by and through his undersigned counsel, would respectfully allege and show as follows:

INTRODUCTION

Dr. Larry Reid has spent decades mentoring, housing, clothing, and ministering to black inner-city families. He provided employment, rent-free homes, and opportunities to travel with his award winning gospel ensemble and band. For some young black men, Dr. Reid was not only a father figure, but their primary source of stability, their safety net, and an idol in the community.

In 2017, Dr. Reid closed the brick-and-mortar doors of his church forever. This had a devastating impact the change would have on the people that relied on him and his ministry. Dr. Reid was focused on his new way of ministering, including TV, his YouTube channel, his books, radio, acting, and his music, seeking to share the Word through entertainment and comedy.

One of Dr. Reid's young parishioners was Lavontraye Andrews, who began attending Dr. Reid's church in late 2006 when Mr. Andrews was 16. Mr. Andrews led a troubled life plagued by lies, petty theft and truancy, but the ministry took him in, providing rent-free housing, part-

time work, and years of opportunities to tour the country as a drummer in Dr. Reid's gospel band. When the church closed in 2017, Mr. Andrews lost his father figure, his job, and the system that had bailed him out of trouble time and again.

Unfortunately, Mr. Andrews never bounced back, and has now sunk to new lows. Rather than find stable employment or a home of his own, he has bounced from eviction to eviction, without employment, and eager to cash in on opportunities for quick money. He also appears to harbor deep resentment towards Dr. Reid stemming back to being kicked out of one of the homes Dr. Reid provided, losing proximity to Dr. Reid, and the 2017 dismantling of Dr. Reid's church, which cost Mr. Andrews any connection to Dr. Reid, his stability, and his perception of his own self-worth.

Over the past year, Mr. Andrews has happily accepted money, publicity, and sympathy from various social media influencers who are known enemies of Dr. Reid in exchange for telling heinous lies that Dr. Reid forcibly fondled him when Mr. Andrews was 14 and/or 15. Mr. Andrews knows this did not happen, but for some undisclosed personal reason(s) he needs to make this lie true to himself and others. Doing so comes with monetary and popularity value.

However, Mr. Andrews cannot even keep his stories straight, changing dates and other details from interview to interview. Moreover, his account is impossible, as he claims to have been assaulted in a home that did not yet exist at the time he alleged the crime to have occurred. Yet, these interviews continue to air, always on platforms hosted by influencers who seek views, money, and retribution rather than any truth.

Dr. Reid has refused to sit by and stay silent legally. He initiated a lawsuit in late 2022, only to have Mr. Andrews claim that he was not domiciled in North Carolina, where Mr. Andrews was, in fact, living, and thus, where the lawsuit was filed. Dr. Reid dismissed the action

without prejudice to investigate Mr. Andrews' claims regarding his domicile because he knew the pattern of Lavontraye to lie his way out and into situations. The investigation is now complete, and it turns out that Dr. Reid was correct. Mr. Andrews was and is living in North Carolina, at the exact location where he was served, which is the exact location he swore under oath was not his address. We now have concrete proof of domicile.

BACKGROUND FACTS

THE PARTIES

1. Plaintiff Larry D. Reid ("Dr. Reid") is an ordained minister, author, songwriter, gospel recording artist and actor who has given his life to ministry. Reid is also well-known as a comedic commentator who discusses matters involving pop culture, politics and religious leaders and their movements.

2. Reid is an individual and resident of Fulton County, Georgia.

3. Plaintiff, Larry Reid Live, LLC ("LLR") is sponsored by the MBN Network, which is a 501(c)(3) compliant ministry. LRL airs to a combined audience of nearly 400,000 people weekly on Facebook and YouTube with over thirty-two million views on YouTube alone. Dr. Reid and LRL are referred to collectively as "Plaintiffs."

4. LRL is a limited liability company organized under the laws of the State of Georgia with its principal place of business in Fulton County, Georgia. LRL neither has, nor at any time relevant hereto had, branches, offices, or facilities in the State of North Carolina. Reid is the sole member of LRL.

5. Defendant, LaVontraye Andrews, is an individual and resident of Forsyth County, North Carolina.

PARTIES, JURISDICTION AND VENUE

6. This Court has jurisdiction over this matter pursuant to 28 U.S.C. § 1332 (a)(1) in that the amount in controversy exceeds \$75,000.00 and there is complete diversity of citizenship between the parties.

7. This Court has personal jurisdiction over Defendant.

8. Venue in this Court is proper pursuant to 29 U.S.C § 1391(b)(1) in that the Defendant, a resident of Forsyth County, North Carolina, resides within the Middle District of North Carolina, Winston Salem Division.

FACTUAL BACKGROUND

DR. REID AND EARLY MINISTRY

9. Dr. Reid, an ordained minister, began his church, the Breakthrough Temple Apostolic Holiness Church (“Breakthrough”), in 1998 after pastoring his first year in Goldsboro NC.

10. This church began with just three people in Fayetteville, North Carolina, and eventually grew to well more than 150 members locally.

11. Often, wayward members of the Fayetteville community would wander through the church, clearly in need of a home and some direction. Dr. Reid and other church elders took these people in, and gave them fellowship, a chance at sobriety, employment, a place to live, and hope.

12. Often these people were homeless and/or jobless. Dr. Reid therefore regularly housed members of the congregation, often placing people in homes that Dr. Reid owned or rented, and under the care and mentoring of a church elder who lived in the home as well.

LAVONTRAYE'S INTRODUCTION TO BREAKTHROUGH

13. In 2006, Sharon Andrews-Bennison was a member of Breakthrough and a leader within the congregation.

14. At that time, Ms. Andrews-Bennison told numerous members of Breakthrough that she had serious concerns about her son, Lavontraye Andrews.

15. Lavontraye Andrews was born on October 18, 1990. Accordingly, he was 15 years old at this time.

16. Ms. Andrews-Bennison told church elders that her son was doing very poorly at school, incessantly lying, and stealing things, including her car.

17. As a result of these concerns, and at Ms. Andrews-Bennison's request, Dr. Reid's assistant pastor, Chamaco Bryant, agreed to mentor Mr. Andrews.

18. Mr. Bryant spent a lot of time with Mr. Andrews, picking him up at his home, taking him to movies, playing basketball with him, and encouraging him.

19. During the mentoring relationship in 2006, Mr. Andrews told Mr. Bryant that he had been sexually assaulted and taken to strip clubs as a minor. Mr. Andrews accused a former pastor and a cousin.

20. Mr. Andrews later recanted these stories to Mr. Bryant. It became clear that Mr. Andrews was a pathological liar who would invent stories for attention, including stories accusing others of sexual misconduct.

21. Mr. Bryant was part of the music department at Breakthrough, and he helped Mr. Andrews develop his skills on the drums as part of this mentorship arrangement. Mr. Andrews started attending church regularly and playing the drums at church services.

BREAKTHROUGH MOVES TO RALEIGH

22. Breakthrough grew until it had outgrown Fayetteville. In March 2007, Dr. Reid moved the church to Raleigh.

23. Many of Breakthrough's congregants wanted to move to Raleigh so they could stay involved with Breakthrough and better opportunities in North Carolina's capital.

24. At the same time that Dr. Reid was moving his church to Raleigh, Ms. Andrews-Bennison was facing foreclosure on her house. She asked the church elders for financial assistance, and asked if the church could provide her and her son with housing in Raleigh to continue to attend the ministry.

25. The church obliged, and Ms. Andrews-Bennison moved and eventually Mr. Andrews did along with his mom. They moved into a home that was shared by numerous congregants and led by Dr. Reid assistant pastor, Mr. Bryant. Mr. Andrews, enrolled in the local high school, Garner High School.

26. At the time Mr. Andrews moved to Raleigh, he was almost 17 years old.

27. Despite Mr. Bryant's efforts and mentorship, Mr. Andrews continued to display troublesome and unruly behavior, including repeated instances of car theft, truancy, and lies, as well as engaging in sexual relationships with women outside of marriage. Mr. Andrews' lies and the problems were well known to members of the church.

28. Throughout this entire time, Dr. Reid had not personally met Mr. Andrews beyond passing at church and rehearsals. They had no personal relationship at all at this point.

29. Dr. Reid met Mr. Andrews for the first time in late 2007, when Mr. Andrews was 17 years old. Dr. Reid, like Mr. Bryant and other church elders, wanted to see Mr. Andrews make better life choices. Dr. Reid particularly thought that his sagging pants and attire was

inappropriate creating the wrong impression. That day with his assistant Vincent Hill they took Mr. Andrews to get new attire.

30. Soon thereafter, in late 2007, Mr. Andrews asked if he could move from the house where he was living with assistant pastor Bryant. Mr. Andrews specifically wanted to move into the home owned by Dr. Reid and located at 3216 Olustee Drive in Raleigh (“the Olustee Drive Home”). This is the home Mr. Andrews alleged that his allegations occurred as noted on his Police report filed in 2018 months after Dr. Reid cut him off.

31. At that time, the Olustee Drive Home was brand new. It was not built or suitable for occupancy until October 31, 2006. A copy of the Wake County property records showing the completion date of October 31, 2006, is attached as Exhibit A.

32. In other words, Mr. Andrews was 16 years old the date the Olustee Drive Home was issued a certificate of occupancy.

33. Up until late 2007, Dr. Reid had been living at the Olustee Drive Home with his wife and oldest daughter with another church elder Vincent Hill.

34. In January 2008, when he was 17 years old, Mr. Andrews moved into the Olustee Drive Home. The same day, Dr. Reid moved out of the Olustee Drive Home and into a townhome on Kohler Lane and Nathan Locklear and his family and others moved in.

MR. ANDREWS’ CRIMES AND LIES

35. After Mr. Andrews moved into the Olustee Drive Home, Mr. Andrews lived with Dr. Reid’s nephews, Samuel and Damion Reid, and a church elder named Nathan Locklear and his family.

36. Mr. Locklear discovered that Mr. Andrews had stolen Mr. Locklear's car keys. Mr. Andrews admitted that he had taken the keys so that he could steal Mr. Locklear's car every night to sneak out and have sex with another church member, Angela Gore-Williams.

37. As a result of this ongoing car theft and sexual misconduct, Mr. Andrews was kicked out of the Olustee Drive house and was in another house within the ministry.

38. In 2009, when Mr. Andrews was 18 years old, Dr. Reid moved back into the Olustee Drive Home and shortly thereafter he allowed Mr. Andrews to move back into Olustee home and out of another property Dr. Reid had where he stayed there with others. At the same time, two additional church members resided in the home with Dr. Reid. This was the first time Dr. Reid and Mr. Andrews were living 3216 Olustee Drive together.

39. However, after a few months, in January 2010, Mr. Andrews was again kicked out of the house for breaking rules. That time, Mr. Andrews got caught skipping school and stealing a car to have a sexual relationship with a new girlfriend in the church, Ashley Shaw - Andrews, who was a church leader five years his senior.

40. Church elders called Dr. Reid, who was in London at the time, and asked what they should do. Dr. Reid told Vincent Hill to kick Mr. Andrews out of the house and to kick Mr. Andrews out of the ministry, and they did so. This was the final time Mr. Andrews was kicked out.

41. At the time, Mr. Andrews' girlfriend, Ashley, claimed that Mr. Andrews was harassing her and wouldn't leave her alone. In February 2010, Dr. Reid sent an email to Mr. Andrews asking him to leave Ashley alone.

42. Dr. Reid later learned that Ashley was still having a sexual relationship with Mr. Andrews and was lying to appear an integral church leader.

43. Ashley also had been lying to her roommates that she was having a sexual relationship with Dr. Reid and they would marry.

44. These lies resulted in Dr. Reid asking Ashley to leave Breakthrough and the home where she and others were living, which also had been provided by Dr. Reid.

45. Once both Mr. Andrews and Ashley had been kicked out of the church and out of homes provided by the church, they married each other.

46. After they had both been kicked out of the church, Mr. Andrews claimed that Dr. Reid had forcibly fondled and molested him. Word of these accusations got back to Dr. Reid friend named Patrick.

47. At this time, Ms. Andrews-Bennison (Mr. Andrews' mom) defended Dr. Reid. She told other members of Breakthrough that her son was a compulsive liar, and that his claims of being forcibly touched and molested were untrue.

48. Mr. Andrews later admitted that he had made up the allegations and he personally apologized to Dr. Reid for spreading lies about being forcibly touched and molested.

49. Despite the fact that Mr. Andrews had been kicked out of the housing in the ministry twice for stealing cars, and despite the fact that Ashley had been kicked out of the ministry for lying about having an affair with Dr. Reid, and despite the fact that Mr. Andrews had accused his cousin and a pastor of sexual misconduct and later admitted that all three accusations were false, Mr. Andrews and Ashley had not yet caused enough drama or pain at Breakthrough.

50. They begged to return to the ministry in late 2010.

51. Although the request was initially refused, Mr. Andrews' mother, Ms. Andrews-Bennison, also started begging Dr. Reid to let them return to the ministry along With Chamaco's insistence. They eventually needed housing again that Dr. Reid provided in his name.

52. Dr. Reid vehemently refused them coming back but ultimately allowed them to come back to the church. Until sometime in 2012, Mr. Andrews and Ashley lived in a property Dr. Reid rented for them or provided through a member's consent.

53. Afterwards Mr. Andrews and Ashley shuffled around from home to home, staying with various members of the church.

THE MUSIC

54. In 2011, Mr. Andrews became the lead drummer at Breakthrough. He was 20 or 21 years old.

55. At around the same time in 2011, Dr. Reid recorded an album of original gospel music.

56. The album hit the Billboard gospel charts, creating new opportunities for Dr. Reid and his ministry.

57. Dr. Reid invited his singers and band members to perform in numerous music shows around the country and abroad.

58. This was an incredible opportunity for Mr. Andrews, who played the drums in these shows.

59. Dr. Reid's gospel band toured until 2016.

60. During this time, Mr. Andrews received a small stipend for playing the drums.

61. Other than doing these shows, Mr. Andrews did not have any stable or ongoing employment.

62. He worked at a Dairy Queen for a very short period of time but was fired. He may have also other low-wage, unskilled work, but no job ever stuck. Upon information and belief, Mr. Andrews never graduated from high school and never obtained any other type of skilled training.

LARRY REID LIVE AND CHURCH DISMANTLING

63. In 2016, Dr. Reid started streaming his live show “Larry Reid Live.”

64. “Larry Reid Live” is freely available on YouTube and Facebook and promoted in various ways including by an associated business page on Facebook, Twitter, IG, and TikTok.

65. “Larry Reid Live” now has over 140,000 subscribers on YouTube alone with over 32 million views. Another 230,000 followers on Facebook with 45 million views.

66. Episodes generally follow a talk show format, with monologues by Reid, discussions of a variety of topics, remote and in person interviews with guests, music, and live calls with viewers, who engage with Reid on the topics presented on the program. During each episode, viewers may also comment online, and those comments appear in real time as a text stream that appears beside the video.

67. Reid discusses a variety of topics most of which center on faith, spirituality, sexuality, fatherlessness, abuse of women, personal and spiritual growth, and events and affairs in the faith communities familiar to Reid and his viewers.

68. Reid does so in a humorous and relatable way intended to be accessible to a broad audience. Reid reviews books, discusses music, and comments on personalities and trends in the ministry, and events in the church, including what he considers the pernicious effects of greed, hypocrisy, and scandal. He also discusses general and non-religious matters, such a current

events, cultural happenings, controversial topics, and politics. This has landed Dr Reid on national and international TV and discussed on major media outlets across the world.

69. Episodes of the Program also contains advertisements, embedded in the video stream by YouTube. What advertisements appear during varies by viewer and is determined by YouTube and Facebook's algorithms.

70. Paid advertising revenue is shared with YouTube, and accounts for about twenty percent (20%) of program revenue. Also, movies, plays, and films pay to advertise upcoming projects on the Program.

71. The Program is a commercial enterprise and generates incomes and profit leads for The MBN Network that sponsors LRL, of which Reid is the sole member. Along with the subscription and advertising revenues described above, the Program promotes Reid generally, and directs attention and potential business to his other ventures, which include LDREnterprises, The MBN Network, Reformation Church of Atlanta, and his personal teaching, speaking, in-person appearances, acting and musical performances.

72. LRL has more than 400,000 subscribers or followers across Facebook and YouTube. Gross revenues for Reid and LRL from all activities, online and offline, are estimated to be between Forty Thousand Dollars (\$40,000.00) and Sixty Thousand Dollars (\$60,000.00) per month. The Program, its subscribers and its advertising revenues are the central activities upon which other income stream depends.

DISMANTLING OF BREAKTHROUGH

73. In 2017, Dr. Reid decided to dismantle his brick-and-mortar church completely. Dr. Reid was not only exhausted with the daily struggles of keeping his congregation employed,

housed, fed, and uplifted, but felt called to another way. The overall energy level at the church was draining and was preventing Dr. Reid from achieving bigger goals and dreams.

74. During the low period of total burn-out, Dr. Reid shut down Breakthrough and severed all communications with all members.

75. The closing of Breakthrough and Dr. Reid's decision to cut off contact in 2017 was Earth-shattering for Mr. Andrews and others.

76. At that time, Mr. Andrews relied on Dr. Reid and Breakthrough for his main church drumming gig which was his main source of income which brought him other opportunities to make income.

77. It could be easily assumed that Mr. Andrew's self-identity, self-worth, and purpose all were derived from his relationship with Breakthrough and particularly Dr. Reid at the time. Indeed, Mr. Andrews' mother and other ministry members often mentioned the idolization Mr. Andrews had for Dr. Reid, to the point it was described as an inappropriate obsession. He was so inspired and enamored by him he would attempt to dress, talk, sound like and sing like Dr. Reid. Unbeknownst to Dr. Reid Mr. Andrews had many at his school and in the community thinking that Dr. Reid was his real father.

78. With Breakthrough closed, Mr. Andrews eventually lost everything: his home, his income, and his sense of importance.

79. Dr. Reid should have been more thoughtful about how the closure of Breakthrough would affect the congregation. He was a father figure to all the fatherless ones and took care of many of them as a dad. He now deeply regrets the way he handled the situation.

80. Although Mr. Andrews had not accused Dr. Reid of molesting him since 2010, Mr. Andrews began making the allegations against Dr. Reid again in 2017 shortly after Dr. Reid

disbanded the church and isolated himself and unfriended Mr. Andrews on Facebook. This is when all hell broke loose. All of this after more than seven years of being back in the ministry after forgiven of the accusations and attempting to reconcile with Dr. Reid and be in closer in proximity had failed. Dr. Reid no longer trusted Mr. Andrews after his return and as a result didn't afford him the same access as he had prior, and Mr. Andrews constantly complained of it and created fictitious situations to where Dr. Reid would have to give him some kind of attention even though it was just a call. Mr. Andrews eventually confessed this to Chamaco Bryant the assistant pastor.

81. These accusations were part of the ongoing pattern of accusations that Mr. Andrews had made before not just of Dr. Reid but his former pastor and his cousin. Every time Mr. Andrews felt disappointed or let down by men in his life, he accused them of abandonment and eventually some type of sexual misconduct or inappropriateness.

82. Throughout his early adult years, Mr. Andrews publicly and privately went out of his way to express his affiliation with and adoration of Dr. Reid. These actions were entirely inconsistent with his claims that Dr. Reid abused him in any way and was a shock to may including his own mother at the time.

Defendant's Campaign Against Reid

83. Beginning in December 2019, social media personality began to disseminate a series of videos and live streaming videos on YouTube which persistently, and with growing intensity, leveled defamation allegations against Dr. Reid, which eventually included the false allegation that Dr. Reid had sexually molested and forcibly fondled Mr. Andrews.

84. On his YouTube channel, Moore revealed a 2018 police report cover from Raleigh, North Carolina. The police report cover does not bear Reid's name but shows the

Olustee Drive Home street address and reflects an allegation of forcible fondling. Notably, this report was created in 2018, after Breakthrough was disbanded and during the time that Mr. Andrews had begun his attacks on Dr. Reid.

85. Dr. Reid was never made aware of this incident report prior to that YouTuber's videos.

86. That youtuber invited Mr. Andrews on his YouTube channel, where Mr. Andrews claimed that he filed this police report against Reid.

87. Notably, Mr. Andrews claimed on the show that Dr. Reid had forcibly fondled and molested him when he was fourteen years old.

88. Dr. Reid was never contacted, no charges were ever brought, and there is currently no active investigation into this claim by the Raleigh Police Department.

89. After Mr. Andrews interview on that platform, on April 20, 2021, Dr. Reid sent a cease-and-desist letter to Mr. Andrews through his counsel.

90. As a result of the cease-and-desist letter, it appeared that Mr. Andrews refrained from spreading the false child molestation rumors until his most recent alliance with Lamor Whitehead ("Whitehead").

Lamor Whitehead's Animosity toward Dr. Reid

91. On July 24, 2022, Mr. Whitehead, a pastor of a New York church, was robbed at gunpoint while streaming his online church service. The video of the robbery was thus available for the world to see.

92. According to news reports, Mr. Whitehead, a "showy pastor," was robbed of more than one million dollars' worth of jewelry including his watch, multiple chains, his wedding band, and necklaces.

93. Dr. Reid posted the video of the robbery on the LRL platform which made it go viral internationally.

94. In the same post, Dr. Reid also discussed his personal interactions with Mr. Whitehead, and questioned Mr. Whitehead's integrity. Specifically, Dr. Reid questioned if Mr. Whitehead had scammed people out of money.

95. Mr. Whitehead became very angry with Mr. Reid for publicizing Mr. Whitehead's alleged misdeeds.

96. That week, Mr. Whitehead requested to join the LRL platform and joined Dr. Reid while he was live on Instagram. Mr. Whitehead immediately became irate, fat shaming Dr. Reid's guest, calling Dr. Reid "ugly" and waging homophobic slurs against him.

97. Beginning that day, and continuing to the present, Mr. Whitehead has engaged in an all-out assault on Dr. Reid, which has taken many forms, including numerous social media posts and a civil lawsuit for defamation. Mr. Whitehead will stop at nothing to harass and defame Dr. Reid.

98. Mr. Whitehead obtained the old videos of the youtuber's interview of Mr. Andrews and decided to use them as additional ammunition against Dr. Reid. They were sent to him by that youtuber a year after he had removed them under a court order.

99. Mr. Whitehead created an "Exposing Reid" segment on his Facebook platform where he played the interview from that youtuber's show for thousands of viewers. During the videos, Mr. Andrews' defamatory statements were rebroadcast to a much wider audience.

100. Prior to the release of this video on Mr. Whitehead's channels, Dr. Reid took to his platform to denounce all of these rehashed claims.

101. Mr. Whitehead eventually removed all the videos produced by that youutber, including the interview with Mr. Andrews, but not before they were viewed thousands of times.

102. On October 8, 2022, Whitehead announced on his Facebook page that that he was going to have a guest on his Live show who would accuse Larry Reid of sexual abuse and sexual molestation of a minor. This guest was Mr. Andrews.

103. On that same day, on Mr. Whitehead's Facebook and YouTube platforms, Defendant made the following allegations:

- a) "Larry Reid molested me" (52:19-35)
- b) When asked about the "open investigation" in North Carolina, referring to his 2018 incident report, Defendant claimed that the investigation in North Carolina "is for sure still open," which falsely suggested there is an active investigation by the Raleigh Police Department against Reid for sexual misconduct. (1:12:10-31)
- c) That his allegation of molestation "is proven" (52:31).
- d) "The reality is he did something inappropriate with a teenager, a child." (54:10-21).
- e) "In a nutshell, he molested me." (54:21-30)
- f) He (Dr. Reid) did things to him and gave it a "spiritual basis." (55:40-44).

104. Each of these allegations is false. Dr. Reid never forcibly fondled or molested Defendant. Further, the Raleigh Police Department is not currently actively investigating any claims of molestation against Dr. Reid, nor has Defendant proven his allegations are true. In fact, Mr. Andrews has not put forward any evidence to support his claims.

105. Mr. Andrews then used this time on Whitehead's platform to try to clean up the obvious discrepancies and contradictions in his initial allegations in the unnamed youtuber's interview. He now claims:

- a) "He lived with Reid at several different locations and that [the Oulstee Street Home address] was the only address he could remember." (52:58-53:17).
- b) "Getting to the age thing, one of the other guys that I talked to...a couple years ago, I did an interview with a guy and me talking quick, I said 14. . . . [but] I was 15 when it happened." (53: 36 to 54:10).

106. This attempt to correct the narrative still fails, as it continues to assert impossible facts. The Olustee Drive Home was not built until Mr. Andrews was 16.

107. Furthermore, even if Mr. Andrews wants to assert that he made a mistake about the details because he was caught off guard in an interview, such an excuse hardly explains the fact that the same "mistakes" are set forth in the police report that Mr. Andrews swore out, surely with much forethought and ability to provide basic facts.

108. A copy of the summary of the incident report shows unequivocally that Mr. Andrews had identified the Olustee Drive address as the location of the incident.

RALEIGH POLICE DEPT.		OFFENSE/INCIDENT REPORT				Page: 1	
CRIME(S) - CLASSIFICATION: Sex Offense/Forcible Fondling		UCR: 17D	DATE/TIME RPTD: 08/06/18 16:39	SHIFT: 02	BEAT: 433	COMPLAINT NO: p18042366	
LOCATION OF CRIME: 3216 OLUSTEE DR		TYPE OF PREMIS:					
OFFENSE DAY(S): MON TO MON		DATE OF OFFENSE: 08/06/18 TO 08/06/18	HRS OF OFFENSE: 14:00 TO 14:00	OFFICER'S NAME: BROWN		CODE NO: 4329	
REPORTED BY:		RACE:	SEX:	AGE:	COMPLETE ADDRESS:	PHONE:	
CODES --> S-STOLEN R-RECOVERED L-LOST D-DAMAGED PROPERTY F-FOUND PROPERTY							
CODE:	QTY:	DESCRIPTION OF PROPERTY:				VALUE:	
		VALUE DAMAGED:		VALUE RECOVERED:		TOTAL VALUE STOLEN:	
VICTIM(S) (LAST, FIRST, MI):		RACE:	SEX:	AGE:	COMPLETE ADDRESS:	PHONE:	
EMPLOYER-SCHOOL:		BUSINESS PHONE:		CITY/STATE:			
PERSON(S) ARRESTED:		RACE:	SEX:	AGE:	HOME ADDRESS:	CHARGE:	

109. Despite knowing these allegations are false, Mr. Andrews has continued making them publicly and seems to be willing to work with anyone who has a vendetta against Dr. Reid and who will give him a platform or financially rewarding opportunity to spew these vile and false allegations.

THE INITIAL DEFAMATION LAWSUIT

110. On October 13, 2022, Dr. Reid filed a Complaint in this Court against Mr. Andrews for defamation.

111. Dr. Reid filed the lawsuit in this court with knowledge that Mr. Andrews was living with his mother in Kernersville, North Carolina, at 1700 Rose Hill Court.

112. Mr. Andrews' mother accepted service of the complaint and confirmed to the process server that Mr. Andrews lived with her at that address. The process server's affidavit is attached as Exhibit B.

113. Mr. Andrews moved to dismiss the case on the basis of a lack of diversity jurisdiction, asserting that he was domiciled in Georgia, not North Carolina.

114. In connection with that motion, Mr. Andrews provided a sworn affidavit, attached as Exhibit C hereto, in which he testified that he was domiciled in Georgia. The only evidence he provided was a copy of his 2020 Georgia driver's license with his address blacked out.

115. Dr. Reid (and his counsel) found the affidavit and redacted driver's license unconvincing; nonetheless, given the short timeframe to gather additional evidence of Mr. Andrews' residence, Dr. Reid dismissed the case without prejudice in December 2022.

TASHA K.

116. Latasha Transrina Kebe, known as "Tasha K" is a social media personality who publishes videos and podcasts about celebrities and celebrity gossip.

117. Tasha monetizes her gossip stories in a variety of ways, including by releasing videos on the subscription-based Patreon website and her mobile app that viewers much pay to watch.

118. Tasha K became a household name in 2022 when a federal jury ordered her to pay \$4 million to Grammy-awarded platinum recording artist Cardi B for defamation and slander.

119. That jury determined that Tasha K falsely accused Cardi B of having herpes, being a former prostitute, and using cocaine.

120. Tasha K testified during the Cardi B trial that she posts contents she knows to be false to make money, and that she does not have responsibility to tell the truth about the celebrities she discusses.

121. On or about January 12, 2023, Tasha K published a two-hour-long interview with Mr. Andrews titled “Larry Reid | Pastor? PROPHET? Or PEDO? | The Story of 15 Year Old Lavontray[sic] Andrews.” She did this after phoning Dr. Reid where he denied all she alleged and told her that if she went public, she would be going public with a lie. The conversation was recorded.

122. The full video is only available to paid viewers on Patreon, but a clip can be viewed at www.youtube.com/watch?v=vAhOMnEnMVg.

123. In the interview, Mr. Andrews made multiple false and defamatory allegations, all of which accuse Dr. Reid of being sexually inappropriate with him while he was underage.

- a) “He was wrapped up naked in a blanket . . he told me to take off all my clothes and told me to sit down beside him.” [1:37]
- b) “He put porn on. Gay porn. And he told me to watch it.” [1:37]
- c) He asked Mr. Andrews to “film yourself dancing naked.” [1:40]

- d) “so he was like, ‘well why don’t you just turn around then’” and “he started jacking off.” [1:41]
- e) “He wanted me to take all my clothes off and lay on the floor, lay on my back. And he starts giving me a massage . . and he finally just grabbed it. I was like ‘yo, whoa,’ . .and he was like ‘just relax, just relax . . .this is part of the test’ and he proceeds to jack me off.” [1:45]
- f) Dr. Reid would pay him “\$60” to dance naked in front of him [1:52]

124. All of these statements are false, and all accuse Dr. Reid of sexual crimes against a minor.

125. After giving this interview, Mr. Andrews did another interview on January 30, 2023, accusing Dr. Reid of molesting him on the YouTube channel “All About the Trees.” This interview included a direct request for donations.

126. Mr. Andrews did these interviews at a time that he did not have any full-time work and was living with his mother after being evicted from numerous apartments.

127. Mr. Andrews has ample motivation to lie because his interviews have brought him substantial income.

MR. ANDREWS RESIDENCE/ DOMICILE

128. Despite his affidavit to the contrary, Mr. Andrews has been living in Kernersville, North Carolina at 1700 Rosehill Court since long before the initial complaint was ever filed.

129. Mr. Andrews was evicted from his apartment in McDonough, Georgia on February 2, 2022, as evidenced by court records.

130. Mr. Andrews has not had any place of residence in Georgia since that eviction.

131. The initial complaint was served at the Rosehill Court address in Kernersville, at which time Mr. Andrews' mother answered the door, accepted the papers, and confirmed that Mr. Andrews lived at that address.

132. Investigation revealed that Mr. Andrews' vehicle was frequently parked at the Rosehill Court address throughout November and December 2022.

133. Investigation revealed that Mr. Andrews was employed part time as a roadie by the Who's Bad band, which is based out of Raleigh, North Carolina, which practices in Raleigh, and which departs for his touring locations from a home base in Raleigh.

134. Mr. Andrews has stated that he lived at the Rosehill Court address in government filings, including in documents filed with the United States Patent & Trademark Office and the North Carolina Secretary of State's Office.

135. Mr. Andrews resides in, and is domiciled in, North Carolina.

FOR A FIRST CAUSE OF ACTION
Defamation and Slander *per se*

136. Plaintiffs reallege and incorporate the allegations of Paragraphs 1-135 of the Complaint, and all subparts thereof, as though fully set forth herein, verbatim.

137. As set forth above in Paragraphs 103 and 123 and all subparts thereof, and incorporated herein by reference as though fully set forth, the Defendant spoke base or defamatory words which tended to prejudice Reid in his reputation, business, and means of livelihood, and which were intended to and did hold him up to ridicule, disgrace and contempt by falsely accusing Reid of committing a crime involving moral turpitude, specifically sexual abuse of a minor.

138. The statements identified in Paragraphs 103 and 123 and all subparts thereof, and fully incorporated herein by reference as though fully set forth, are in fact false.

139. The statements identified in Paragraph 103 and 123 and all subparts thereof, and fully incorporated herein by reference as though fully set forth, were and are defamatory per se because they impugn Reid and his character as it relates to his trade or profession, to wit, both as a member of the ministry and in his online activities, both ministerial and as a commentator and online personality.

140. The defamatory statements made and published by Defendant have damaged Reid's reputation and character within his profession and industry and have interfered with his current and prospective business relationships.

141. Defendant knew or should have known that his defamatory statements made were false and he acted in reckless disregard of the truth or falsity of those statements when he made them. Defendant's actions constitute actual malice.

142. Defendant's defamatory statements were published to a third party by way of broadcast on Whitehead's YouTube channel and Facebook page.

143. As a direct and proximate result of Defendant's actions, Reid has been damaged in an amount in excess of \$75,000.00, the exact amount to be shown at trial.

FOR A SECOND CAUSE OF ACTION
Unfair and Deceptive Trade Practices, N.C. Gen. Stat. § 1-75.1 *et seq.*

144. Plaintiffs reallege and incorporate the allegations of Paragraphs 1-143 of the Complaint, and all subparts thereof, as though fully set forth herein, verbatim.

145. Defendant's above-referenced defamatory statements were in commerce or affected commerce as set forth and defined in N.C. Gen. Stat. § 75-1.1 *et seq.*

146. Defendant's above-referenced defamatory statements constitute unfair and deceptive trade practices in violation of Chapter 75 of the North Carolina General Statutes, as,

among other things, Defendant acted in a manner that was immoral, unethical, oppressive, had a tendency to deceive, and/or was substantially injurious to Plaintiffs.

147. Defendant engaged in unfair and deceptive trade practices by, among other things, falsely accusing Reid of sexual misconduct and sexual abuse of a minor, falsely stating that Reid was the subject of an ongoing police investigation, falsely stating that his allegations of sexual misconduct were proven, and falsely stating that Reid forcibly fondled him and molested him at 14 and later 15 years old. These false statements were intended to and in fact did interfere with Plaintiffs' business.

148. As a direct and proximate result of the Defendant's unfair and deceptive actions, Plaintiffs have been damaged in an amount in excess of \$75,000.00, the exact amount to be proven at trial.

149. Pursuant to N.C. Gen. Stat. § 75-16, Plaintiffs are also entitled to recover trebled compensatory damages from Defendant.

150. Pursuant to N.C. Gen. Stat. § 75-16, Plaintiffs are also entitled to recover their reasonable attorney's fees from Defendant.

FOR A THIRD CAUSE OF ACTION
Punitive Damages- N.C. Gen. Stat. § 1D-1 *et seq.*

151. Plaintiffs reallege and incorporate the allegations of Paragraphs 1-150 of the Complaint, and all subparts thereof, as though fully set forth herein, verbatim.

152. As set forth herein, Defendant has acted willfully, wantonly, maliciously, and fraudulently by making the false and defamatory statements described herein.

153. Plaintiffs are entitled to an award of punitive damages pursuant to N.C. Gen. Stat. § 1D-1, *et seq.*

PRAYER FOR RELIEF

WHEREFORE, Plaintiffs pray that they be granted the following relief:

1. That Judgment be entered against Defendant and in favor of Plaintiffs, in excess of \$75,000.00, on each and all Causes of Action;
2. That Plaintiffs be awarded punitive damages against Defendant as the jury may determine;
3. That Plaintiffs be awarded costs and reasonable attorney's fees;
4. That Plaintiffs have a trial by jury; and
5. For such further and other relief as the Court deems just and proper.

Respectfully submitted, this 18th day of August, 2023.

/s/ Ryan M. Arnold

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Notice of Special Appearance Forthcoming

Counsel for Plaintiffs